

**THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Taylor D. Pendleton,

Plaintiff,

v.

10Q LLC *et al.*,

Defendants.

Case No. 1:23-cv-04708

Dist. Judge Andrea R. Wood

Mag. Judge M. David Weisman

**DEFENDANTS PROPELRL MUSIC, LLC, MARIANI, INC., AND ANTOINE REED'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendants Propelr Music, Inc., Mariani, Inc., and Antoine Reed (collectively, “Defendants”), by their counsel, pursuant to Fed. R. Civ. P. 12(b)(6), move to dismiss Plaintiff Taylor D. Pendleton’s (“Plaintiff” or “Pendleton”) copyright infringement and unjust enrichment claims asserted against Defendants in Pendleton’s complaint (“Complaint”) [Dkt. 1], for failure to state a claim upon which relief may be granted. In support of Defendants’ Motion, Defendants file herewith a Memorandum of Law, which also incorporates court records from a prior action filed by Pendleton in the Central District of California against the same defendants (including Defendants).

WHEREFORE, Defendants respectfully ask this Court to dismiss the Complaint pursuant to FED. R. CIV. P. 12(b)(6) for failure to state a claim upon which relief may be granted, with prejudice, and without further leave for Plaintiff to amend.

Dated: June 28, 2024

Respectfully submitted,

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